Comments on Petition RM-10808

Concerning Amendment of Part 97 Rules
to Eliminate Element 1 (5 Words-Per-Minute
Radiotelegraph Examination) testing on a
limited basis

I do not agree with the author of this petition that Element 1 should eliminated as part of the testing program for the qualification of Amateur Radio Licensees.

The petitioner failed to consider the advantages a amateur skilled in the use of the International Radiotelegraph Code enjoys when undertaking a program of learning about Radio Frequency Design by constructing their own Amateur Radio equipment. The licensing requirements should evaluate the readiness of the the applicant to join the Amateur Radio Service in support of the 'Basis and Purpose' of that Service.

From Part 97.1, 'Basis and Purpose' of the FCC Rules governing the Amateur Radio Service, paragraphs (b), (c), and (d) are relevant here:

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

(c) Encouragement and improvement of the amateur radio service through rules which provide for advancing skills in both the communication and technical phases of the art.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

Clearly, an important activity within the Amateur service is the acquisition of the skill of designing, constructing, and operating one's own Amateur Radio apparatus. The amateur skilled in the use of the International Radiotelegraph Code is in an excellent position to begin such a program, because of the relative simplicity of the equipment required for radiotelegraph code operation. Simple direct conversion receivers, and two stage crystal-controlled transmitters, are simple to construct and debug; and several are available in kit form, and form an excellent basis from which to advance to the construction and testing of more complex apparatus, including equipment for the voice and digital modes.

In contrast to the excellent position enjoyed by the amateur skilled in the use of the International Radiotelegraph Code, the amateur fluent only in voice or digital modes has a much higher barrier to overcome to construct useful apparatus. The design and construction of a phasing or filter type single sideband transceiver is of such a level of complexity, that few amateurs would undertake it unless they had earlier attempted simpler projects, such as radiotelegraph code apparatus. I think it would not be unreasonable to predict that they would never begin to attempt it.

Furthermore, I think the petitioners suggestion of maintaining a number of "mode-specific" examination elements is an unreasonable burden to volunteer examiner coordinators and volunteer examiners, and

adds unnecessary complexity to the examination process. I think that it is not unreasonable to expect an applicant to be a "Renaissance Operator" possessing broad familiarity with the modes currently employed in the Amateur Radio Service, regardless of whether they have immediate plans to make use of any in particular.

Respectfully Submitted,

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